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Via E-Filing

September 6, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States District Court- District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

Re: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation - MDL 2738

Crimmins v. Johnson & Johnson, et al.
Civil Case No. 3:18-cv-15697

Collymore v. Johnson & Johnson, et al.
Civil Case No. 3:19-cv-19787

King v. Johnson & Johnson, et al.
Civil Case No. 3:19-cv-19788

Moore v. Johnson & Johnson, et al.
Civil Case No. 3:18-cv-09924

Sanchez v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-15740

Six v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-15730

Gipson v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-17718

O'Neal v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-21931

Raines v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-21892

Gallagher v. Johnson & Johnson, et al.
Civil Case No. 3:23-cv-21972

Dear Judge Singh:

The Johnson & Johnson Defendants write in reply to Responses to the August 15, 2024 Order to Show Cause filed by Plaintiffs Crimmins (ECF 33213); Collymore (ECF 33215); King (ECF 33216); Moore (ECF 33221); Sanchez (ECF 33230); Six (ECF 33239); Gipson (ECF 33238); O'Neal (ECF 7, Civil No. 3:23-cv-21931); Raines (ECF 9, Civil No. 3:23-cv-21892); and Gallagher (ECF 9, Civil No. 3:23-cv-21972). Plaintiffs Crimmins, Collymore, King, Moore, O'Neal, Raines, and Gallagher all request the Court not dismiss their cases until pending motions to withdraw as counsel are decided. Sanchez, Six, and Gipson request the cases not be dismissed until a motion to withdraw as counsel is filed and then decided. In all ten cases, the PPFs are long overdue, from seven months to nine months depending on when the case was filed. And in none of the cases is there any hope of the PPFs being submitted at all.

The Court should not postpone the dismissal of these cases to consider present or future motions to withdraw. There is no reason to believe that long overdue discovery will be forthcoming if the Plaintiffs proceed *pro se* or engage new counsel. Granting the Plaintiffs' requests will only delay the dismissals and encourage countless Plaintiffs to attempt the same maneuver in response to the current Order to Show Cause and future ones to come.

Plaintiffs have been afforded more than enough time to cooperate with their counsel and comply with the Court's orders. And if their circumstances change, they can attempt to make a case for reinstatement under FRCP 60(b).

Accordingly, Defendants respectfully request Your Honor find these Plaintiffs have not demonstrated good cause in response to the Order to Show Cause entered by the Court on August 15, 2024 (ECF 33096, 3:16-md-2738) and dismiss these cases with prejudice.

Thank you for your consideration of these matters.

Respectfully,

/s/ Susan M. Sharko

Susan M. Sharko

FAEGRE DRINKER BIDDLE & REATH LLP

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and LLT Management, LLC*

SMS/scg

Cc: Counsel of Record (via E-Filing)